

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA


UNITED STATES OF AMERICA  
  
Plaintiff,  
  
v.  
  
Rene Emmanuel VASQUEZ-Perez  
  
Defendant.

Magistrate Case No.: **'07 MJ 8876**  
COMPLAINT FOR VIOLATION OF  
21 U.S.C. § 952 and 960  
Importation of a Controlled  
Substance (Felony)

The undersigned complainant being duly sworn states:

That on or about October 26, 2007, within the Southern District of California, defendant Rene Emmanuel VASQUEZ-Perez did knowingly and intentionally import approximately 2,815.90 kilograms (6,194.98 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Enrique Forregrosa, Special Agent  
U. S. Immigration & Customs  
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 29<sup>TH</sup>  
DAY OF OCTOBER 2007.

  
PETER C. LEWIS  
UNITED STATES MAGISTRATE JUDGE

### **PROBABLE CAUSE STATEMENT**

I, Special Agent Enrique Torregrosa, declare under penalty of perjury, the following is true and correct:

On October 26, 2007 at approximately 1130 hrs Rene Emmanuel VASQUEZ-Perez entered the United States through the Calexico, CA Cargo Port of Entry (POE). VASQUEZ was the sole occupant driver of a 1992 International Tractor bearing CAUS license plate #9B45364 and trailer bearing CAUS license plate #4EC5234.

At primary Customs & Border Protection (CBP) Officer Roberts received a negative Customs declaration from VASQUEZ. CBP Officer ROBERTS noticed that VASQUEZ was nervous and was a new driver for the company and decided to referred VASQUEZ and his truck for further inspection.

Upon arrival to the vehicle secondary lot CBP Officer Velasco and CBP Officer Robinson obtained a negative Customs and Border Protection Declaration from VASQUEZ. CBP Officer Velasco and CBP Officer Robinson requested CBP Canine Officer Caldera to screen the merchandise utilizing his Human Narcotic Detector Dog (HNDD). CBP Officer Caldera screened the merchandise utilizing his HNDD. CBP Officer Caldera advised CBP Officers Velasco and Robinson that his HNDD alerted to the merchandise.

A further inspection of the merchandise revealed several packages containing a green leafy substance, which field-tested positive for marijuana. Calexico ICE Special Agent Torregrosa was notified and responded to the scene. Calexico ICE Agents attempted a Cold Convoy and followed VASQUEZ and the merchandise to R.L. Jones in Calexico, California. VASQUEZ dropped the trailer and the merchandise and drove North-West towards downtown Calexico.

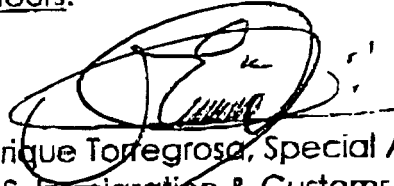
Special Agent Worgen followed VASQUEZ to J.T. parking located at 686 Klope Road, Calexico, California and the rest of the Special Agents secured R.L. Jones warehouse. VASQUEZ was detained and transported to the Calexico East Port of Entry for further processing. The trailer was also transported to the Calexico Cargo Facility for process.

A further inspection of the merchandise revealed three hundred and twenty packages with a total weight of 2,815.90 kilograms (6,216.98 pounds) of marijuana.

VASQUEZ was arrested in violation of 21 U.S.C. § 952 & 960, Importation of a Controlled Substance. VASQUEZ acknowledged and waived his Miranda Rights

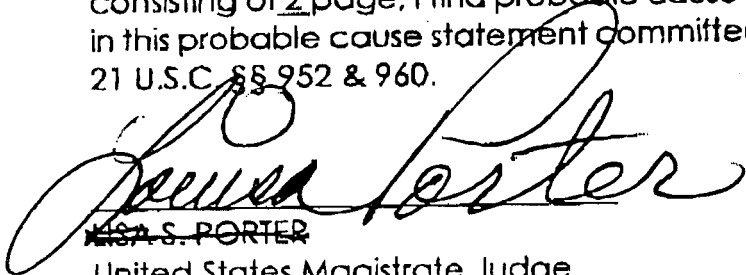
and denied knowledge of knowing that he was smuggling marijuana in to the United States.

Executed on October 26, 2007 @ 2230 hours.



Enrique Torregrosa, Special Agent  
U. S. Immigration & Customs  
Enforcement

On the basis of the facts presented in this probable cause statement consisting of 2 page, I find probable cause to believe that the defendant named in this probable cause statement committed the offense on 10/26/07 in violation of 21 U.S.C. §§ 952 & 960.



~~USA S. PORTER~~

United States Magistrate Judge

Louisa Porter

10/27/07 11:30 AM  
Date/Time